

David Ferguson

From: David Harris <dharris@ci.brownwood.tx.us>
Sent: Friday, February 07, 2014 3:21 PM
To: David Ferguson
Subject: RE: Chapter 18 - Stakeholder Meeting - Feb. 10, 2014

I would like to submit a few written comments on the proposed rules to keep from bogging down the meeting. I do like some of the changes which should provide the excavators better markings to know what we are dealing with underground.

18.1.d.2 I would prefer to keep the 16" for the purposes of Water Utilities replacing broken meters/boxes or service line repairs in the immediate area. Sometimes a meter box is crushed by a delivery truck or other vehicle driving into a yard causing a water leak or damage to the meter or box causing an unsafe condition. Although many meter boxes are only 12" in depth, they are often supported by bricks or concrete blocks to help support the box and protect the infrastructure. These bricks and blocks are often 2-3" which would make the necessary excavation 14" to 16" too do that repair. Meter boxes are not generally replaced with mechanized equipment but with hand digging and shovels in previously excavated soils. I don't feel that this practice causes an unsafe situation for the excavator. If the goal of the change is to reduce excavation in private property to protect shallow service lines from damage, an exemption for meter box/meter replacement would be of great benefit to the water utilities and should not circumvent the goals of the rules.

18.4.(g) "An Excavator must protect markings..." There is a problem when Flags are used to mark lines in lieu of paint. Wire flags can be moved by kids or others that enter the work zone after hours or before construction begins. I would propose that when wire flags are used, that paint must also be used to provide a more permanent marking.

18.8.(e) Same comment as above.

18.10.(b) last sentence "..., the excavator may continue excavation (**with mechanized equipment**) with caution using reasonable care and safe excavation practices." The added words would allow us to use a backhoe below the hand located pipeline. Without this addition, it seems to say that "may continue excavation" would mean only with hand digging since that was the original method. I would also like clarification as to what the TRRC finding will be if we hand dig and locate a line that matches the marks on the ground and we continue to excavate below the line and hit a second line that is active. I would argue that we have met the requirements of the rule and should not be found at fault for hitting the second line if there were only one set of marks.

18.11.(f) There are times that calling 911 is appropriate. If the line hit is a ¾" or 1" low pressure line that has a small cut in the line, calling 911 and having a bunch of fire trucks roll on the job site in a confined alley or work zone would not be beneficial. Two inch or larger that are medium pressure or higher have a much higher risk and need for fire department personnel. I think calling them in that instance would be prudent or if the leak (at any pressure) is in close proximity to a sensitive area such as a nursing home, hospital or school. I don't think is wise to have trucks roll to a small issue and get them out or service for other, more serious calls. I would request that TRRC seek input from some fire and police chiefs and their professional associations for their input.

Please feel free to contact me with questions.

DH

David Harris
Director of Utilities
City of Brownwood

From: David Ferguson [mailto:David.Ferguson@rrc.state.tx.us]
Sent: Friday, January 17, 2014 9:26 AM
Subject: Chapter 18 - Stakeholder Meeting - Feb. 10, 2014

All,

Please see attachments:

Chapter 18 – Public Stakeholder Meeting Invitation

Chapter 18 – Draft Proposed Amendments to Rules in Chapter 18, Underground Pipeline Damage Prevention

After review of comments and further consideration by staff, notable highlights of revisions from the informal proposed rules include:

- Removed incorporated by reference sections of Texas Utilities Code, Chapter 251; added similar language to appropriate areas of Chapter 18.
- Deleted exemptions in section 251.003
- Exempt the movement of earth by hand digging that does not exceed a depth of 12 inches.
- Retain 14 working days as the life of a line locate ticket
- Added requirements for pipeline operators to follow specified procedures.
- Excavation Tolerance Zone
- A locate ticket is limited to 2,640 continuous linear feet within a single county
- Pipeline Operator marking requirements for pipelines 12 inches or less in nominal diameter, or greater than 12 inches.
- Size of pipeline and pipe material included at every other mark.
- Pipeline data provided to one-call notification center within 10 calendar days before initiation of active service.

Best Regards,

David Ferguson

Railroad Commission of Texas
Pipeline Safety Division
Damage Prevention Section
(512) 463-9119
david.ferguson@rrc.state.tx.us